

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF PUERTO RICO**

IN RE:

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LIMENOS CORPORATION

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CASE NO. 20-02169 MCF

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DEBTOR

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CHAPTER 11

**JOINT MOTION TO WITHDRAW AND TO ASSUME LEGAL REPRESENTATION
OF LIMENOS CORPORATION**

TO THE HONORABLE COURT:

COMES NOW Debtor through its undersigned counsel and respectfully states, alleges and prays as follows:

1. On June 5, 2020, the Debtor filed a bankruptcy petition under the provisions of a Chapter 11 of the Bankruptcy Code. See Dkt. No. 1.
2. On June 19, 2020, attorney Francisco Ramos Gonzalez ("FRG") filed his application to employ professional. See Dkt. No. 13.
3. On July 14, 2020, the Honorable Court granted FRG's application for employment. See Dkt. No. 33.
4. Due to personal reasons, FRG have decided to withdraw as legal counsel for the Debtor. As a direct consequence of this decision, FRG is presenting a withdrawal of legal presentation and attorney Nelson Robles Diaz is assuming legal representation of the Debtor. An application for employment will be filed within the next two working days.
5. Attorney FRG will cooperate with attorney Nelson Robles Diaz to have a productive and smooth transition of legal representation, all in the benefit of the Debtor and the other parties in interest.

LBR 9013-1(h) Notice

Pursuant to LBR 9013-1(h), the Debtor provides the following notice:

Within fourteen (14) days after service as evidenced by the certification (plus an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail), any party against whom this paper has been served, or any other party to the action who objects to

the relief sought herein, shall serve, and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico and serve a copy of the same on the undersigned. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted.

unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise..

WHEREFORE, the Debtor requests that this Court enter an Order approving the withdrawal of legal representation by attorney Francisco Ramos Gonzalez and to note that Nelson Robles-Diaz will assume legal representation as the Debtors' counsel, and the application for employment together with pertinent documents will be filed within the next two working days.

Dated: March 25, 2021

Respectfully submitted,

In San Juan, Puerto Rico

LIMENOS CORPORATION

By: /s/ Daniel Sorogastua Ruffner

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Proposed Counsel for the Debtor

I HEREBY CERTIFY that on this day I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will automatically send notification of such filing to all appearing parties in the above captioned bankruptcy proceeding.

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/s/ Francisco J. Ramos González